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Attorney for Defendant, Demetrious Polychron

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

THE TOLKIEN TRUST and THE TOLKIEN
ESTATE LTD,

Plaintiffs,

vs.

DEMETRIOUS POLYCHRON,

Defendant.

Case No.: 2:23-cv-04300-SVW(Ex)

**DECLARATION OF
DEMETRIOUS POLYCHRON IN
SUPPORT OF OPPOSITION TO
MOTION FOR SUMMARY
JUDGMENT.**

DECLARATION OF DEMETRIOUS POLYCHRON

1 I, Demetrious Polychron, declare as follows:

2 1. I have personal knowledge of the matters contained in this declaration and if
3 called as a witness to testify, I could and would competently testify to them.

4 2. I developed a wholly original book and concept for *The Fellowship of the*
5 *King* ("TFOTK"), including separate and distinct characters and storylines from *The Lord*
6 *of the Rings* ("TLOTR") series.

7 3. Additionally, in TFOTK, I introduced many new magical races, enchanted
8 rings, a great many magical worlds that are distinctly separate and apart from TLOTR or
9 any other story that currently exists.

10 4. In TFOTK, any characters with the same name as any character in TLOTR,
11 have been so transformed as they are essentially new characters altogether.

12 5. On November 21, 2017, I secured the exclusive rights and privileges in and
13 to the book of authorship, receiving from the Register of Copyrights a certificate of
14 registration dated and identified as The Fellowship of the King, TXu2-076-068.

15 6. I have removed my book from all third-party sellers and no longer intend to
16 sell it on any platform now or in the future.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct.

19
20 Dated: September 25, 2023

Demetrious Polychron
Demetrious Polychron (Sep 25, 2023 17:39 PDT)
Demetrious Polychron

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DECLARATION OF DEMETRIOUS POLYCHRON